

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO**

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|---------------------------------|---|------------------------------------|
| MICHAEL BURKE | : | CASE: 2:19-CV-2006 |
| Plaintiff, | : | JUDGE WATSON |
| | : | MAG. JUDGE DEEVERS |
| v. | : | <u>MOTION FOR EXTENSION</u> |
| | : | <u>OF TIME FRCP 6(b)</u> |
| JAMES ALEX FIELDS et al. | : | |
| Defendants. | : | |
| | : | |

Defendant Traditionalist Worker's Party ("TWP") respectfully moves the Court for an extension of time within which to file its responsive pleading to the Plaintiff's Complaint. In support TWP states the following:

1. Plaintiff has filed a 64-page Complaint naming no less than 20 defendants and numerous John Does. Plaintiff has included a wide-ranging civil conspiracy claim as well as a notoriously difficult to analyze civil RICO claim.
2. Due to the press of other business as well as scheduled time off, Defendant will not have a reasonable opportunity to review Plaintiff's Complaint by the current response date.
3. The time for filing an answer or other pleading has not yet expired.

4. This motion is not being made for the purpose of delay but is made based upon the need for time to prepare a response.
5. Counsel for Plaintiff does not oppose this motion.

THEREFORE, Defendant Traditionalist Worker's Party respectfully requests the Court for an order extending the time to file an answer or otherwise plead up to and including September 23, 2019.

Respectfully Submitted,

s/ James E. Kolenich

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was served as indicated below on August 14, 2019:

All parties of record were served via the Court's ECF system. No party requires or has requested service by other means

s/ James E. Kolenich

J. E. Kolenich #0077084